

Mark C. Anzman
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FILED
U.S. DISTRICT COURT
DISTRICT OF WYOMING

MAR 30 2011

Stephan Harris, Clerk
Cheyenne

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

UNITED STATES OF AMERICA,

Plaintiff

vs

Danny Hernandez,

Defendant.

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Case No. 10 CR 329-F

MOTION TO APPOINT AN INVESTIGATOR AT GOVERNMENT EXPENSE

COMES NOW, the Defendant Danny Hernandez, by and through Counsel Mark C. Anzman, and his Motion to Appoint an Investigator at Government Expense does allege and state:

1. That this request is pursuant to the Criminal Justice Act and is needed in order for the Defendant to receive due process of law and a fair trial.
2. That the Defendant should be allowed to have an investigator so that the Defendant may fully investigate all aspects of the Defendant's case in preparation for Trial.

WHEREFORE the Defendant prays for the following relief:

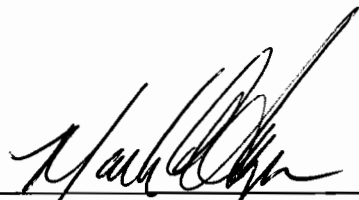
1. That the Court allow the defense to hire an investigator to assist the defense in preparation for trial at the Government's expense.

3. Counsel for Danny Hernandez, has previously used Mr. Steve Reese as an investigator in other matters. Mr. Reese is an experienced investigator and has agreed to perform investigation services at the rate determined by the Court. Mr. Reese's address is 1111 East Lincoln Way, Suite 107 , Cheyenne, Wyoming 82001.

4. That the Court decree such other additional and further relief as the Court deems to be just and equitable.

DATED this ^{30th}~~8th~~ day of March, 2011


By:


Mark C. Anzman
Attorney at Law
400 East 20th Street
Cheyenne, WY 82001

CERTIFICATE OF SERVICE

I certify that a true and accurate copy of the foregoing instrument was served upon the following parties to this action via Clerk's Office Box on this ~~8th~~ day of March, 2011.

Darrell Fun
Assistant United States Attorney

^{30th}

Mark C. Anzman